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October 13, 2015

*Via Email and ECF*

Honorable Michael A. Shipp  
United States District Court Judge  
Clarkson S. Fisher Federal Bldg.  
& Fed. Courthouse  
402 East State Street, Courtroom 7W  
Trenton, NJ 08608

RE: United States v. Marijan Cvjeticanin  
Crim. No. 14-CR-274 (MAS)

Dear Judge Shipp:

According to the Standing Order filed by Judge Thompson on July 7, 2000, the draft Presentence Report (“PSR”) is to be received by the parties no later than 50 days before the sentencing date. We received the draft PSR on October 9, 2015, *via email*, which with the addition of the three additional days provided in the Standing Order (if the PSR is received by other than hand delivery), the received date is October 13<sup>th</sup>. In addition, because October 13, 2015 was a holiday, the actual date the PSR is deemed received is October 14, 2015. Mr. Cvjeticanin respectfully requests the full time allowed pursuant to the Standing Order to prepare adequately for his sentencing hearing, which entails reviewing the draft PSR, objecting to the draft PSR, receiving the final PSR, and writing and submitting a sentencing memorandum and gathering and providing additional material for the Court’s consideration following receipt and review of the final PSR. Therefore, Mr. Cvjeticanin respectfully requests that Your Honor schedule the sentencing date no earlier than December 1, 2015 which is the earliest date that would comport with the Standing Order. Your Honor’s time and consideration is greatly appreciated.

Respectfully submitted,

s/

Lorraine Gauli-Rufo  
Attorney for Marijan Cvjeticanin

cc: Francisco Navarro, AUSA